

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON - PORTLAND DIVISION

JOSE GUTIERREZ, and individual,

Plaintiff,

v.

ST. PAUL FIRE AND MARINE
INSURANCE COMPANY, a Connecticut
corporation, and CHAZNLINE
CONSTRUCTION, INC., a Montana
corporation,

Defendants.

No. 3:16-cv-00139-MM

**STIPULATION AND ORDER OF
DISMISSAL OF ALL CLAIMS
BETWEEN ALL PARTIES**

I. STIPULATION

Plaintiff Jose Gutierrez (hereinafter "Plaintiff") and Defendants St. Paul Fire and Marine Insurance Company and Chaznline Construction, Inc. (hereinafter collectively "Defendants") by and through their attorneys of record, hereby stipulate that all claims between Plaintiffs and Defendants are dismissed with prejudice and without fees or costs to either party.

1 DATED this 3rd day of March, 2016.

2 LETHER & ASSOCIATES, PLLC

KAFOURY & McDOUGAL

3 s/ Thomas Lether

s/ Gregory Kafoury

4 s/ Eric J. Neal

s/ Mark McDougal

Thomas Lether

s/ Jason Kafoury

Eric J. Neal

411 SW Second Avenue, Suite 200

1848 Westlake Avenue N, Suite 100

Portland, OR 97204

Seattle, WA 98109

Phone: 503-224-2647

P: (206) 467-5444/F: (206) 467-5544

Facsimile: 503-224-2673

eneal@letherlaw.com

Kafoury@kafourymcdougal.com

tlether@letherlaw.com

mcdougal@kafourymcdougal.com

Attorneys for Defendant St. Paul Fire and
Marine Insurance Company

jkafoury@kafourymcdougal.com

Attorneys for Plaintiff

9 SMITH FREED EBERHARD

10 s/ Ryan J. McLellan

111 SW 5th Ave, STE 4300

Portland, OR 97204

P: 503.227.2424

F: 503.227.2535

rmclellan@smithfreed.com

Attorneys for Defendant Chaznline
Construction, Inc.

15 II. ORDER

16 Based upon the foregoing Stipulation, it is hereby ORDERED that all claims as between
17 Plaintiff and Defendants are dismissed with prejudice and without fees or costs to either party.

19 DATED this 5th of March, 2016.

21 /s/ Michael W. Mosma

Honorable Michael W. Mosman

Presented by:

LEATHER & ASSOCIATES, PLLC

KAFOURY & McDOUGAL

s/ Thomas Lether

s/ Gregory Kafoury

s/ Eric J. Neal

s/ Mark McDougal

Thomas Lether

s/ Jason Kafoury

Eric J. Neal

411 SW Second Avenue, Suite 200

1848 Westlake Avenue N, Suite 100

Portland, OR 97204

Seattle, WA 98109

Phone: 503-224-2647

P: (206) 467-5444/F: (206) 467-5544

Facsimile: 503-224-2673

eneal@letherlaw.com

Kafoury@kafourymcdougal.com

tlether@letherlaw.com

mcdougal@kafourymcdougal.com

*Attorneys for Defendant St. Paul Fire
and Marine Insurance Company*

jkafoury@kafourymcdougal.com

Attorneys for Plaintiff

SMITH FREED EBERHARD

s/ Ryan J. McLellan

111 SW 5th Ave, STE 4300

Portland, OR 97204

P: 503.227.2424

F: 503.227.2535

rmclellan@smithfreed.com

*Attorneys for Defendant Chaznline
Construction, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Oregon that, on this date, I caused to be served in the manner noted below, a true and correct copy of the foregoing on the parties mentioned below as indicated below:

KAFOURY & McDOUGAL

Gregory Kafoury
Mark McDougal
Jason Kafoury
411 SW Second Avenue, Suite 200
Portland, OR 97204
Phone: 503-224-2647
Facsimile: 503-224-2673
Kafoury@kafourymcdougal.com
mcdougal@kafourymcdougal.com
jkafoury@kafourymcdougal.com
Attorneys for Plaintiff

SMITH FREED EBERHARD

Ryan J. McLellan
111 SW 5th Ave, STE 4300
Portland, OR 97204
P: 503.227.2424
F: 503.227.2535
rmclellan@smithfreed.com
Attorneys for Defendant Chazline Construction, Inc.

☒ ECF ☐ **Via Email** ☐ US Mail ☐ Legal Messenger

DATED this 3rd day of March, 2016.

s/ Andrei Teretchenko

Andrei Teretchenko | Paralegal